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ACKNOWLEDGMENT OF DEPONENT

I, Paula G. Friedman, do hereby acknowledge that I have read and
examined pages 1 through 84 inclusive of the transcript of my deposition and that:
(Check appropriate box)

☐ The same is a true, correct and complete transcript of the answers given
by me to the questions therein recorded.

☒ Except for the changes, noted in the attached Errata Sheet, the same is a
true, correct and complete transcript of the answers given by me to the
questions therein recorded.

5/10/00
Date

Paula Friedman
Signature

CORRESPONDENCE
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ERRATA SHEET

MAY 12 2000

IN RE: Application of Reading Broadcasting,
Incorporated,

MM Docket No. 99-153

Adams Communications
Corporation.

DEPOSITION OF: Paula G. Friedman

DATE OF DEPOSITION: Tuesday, April 4, 2000

At the time the above named deponent read and signed this deposition, the deponent
desired to make the following changes:

<u>PAGE</u>	<u>LINE</u>	<u>AS TRANSCRIBED</u>	<u>CHANGE TO</u>
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Paula Friedman
Signature of Deponent

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION

-----X
In re Applications of :
:
:
:
:
READING BROADCASTING, : MM Docket No. 99-153
INCORPORATED, : File No. BRCT-94047KF
: File No. BPCT-940630KG
ADAMS COMMUNICATIONS :
CORPORATION. :
-----X

Washington, D.C.

Tuesday, April 4, 2000

Deposition of

PAULA G. FRIEDMAN

a witness, called for examination by counsel
for Adams Communications Corporation (ACC)
pursuant to notice and agreement of counsel,
beginning at approximately 10:08 a.m., at the
law offices of Sidley & Austin, 1722 Eye
Street, N.W., Washington, D.C., before Shari
R. Broussard of Beta Reporting & Videography
Services, notary public in and for the
District of Columbia, when were present on
behalf of the respective parties:

BETA

1 APPEARANCES:

2 On behalf of Reading Broadcasting, Inc.:

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4 C. DENNIS SOUTHARD, IV, ESQUIRE
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6

7 On behalf of Adams Communications:

8 HARRY F. COLE, ESQUIRE
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10 (202) 833-4190

11 On behalf of Mass Media Bureau:

12 JAMES W. SHOOK, ESQUIRE
Enforcement Bureau
13 Federal Communications Commission
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14 Room 3-A463
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15

16 On behalf of Deponent:

17 ALAN C. GEOLLOT, ESQUIRE
Sidley & Austin
18 1722 Eye Street, Northwest
Washington, D.C. 20006
19 (202) 736-8250
20

21 ALSO PRESENT:

22 Joseph Booth

* * * * *

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1 P R O C E E D I N G S

2 Whereupon,

3 PAULA G. FRIEDMAN

4 was called as a witness, and having been
5 first duly sworn, was examined and testified
6 as follows:

7 EXAMINATION BY COUNSEL FOR ADAMS

8 COMMUNICATIONS

9 BY MR. COLE:

10 Q Can you state your name and
11 address, please?

12 A It's Paula Friedman, 1100 Rockmont
13 Cliff Road in Rockville, Maryland.

14 Q May name is Harry Cole. I don't
15 think we've ever met, but I'm with the law
16 firm of Bechtel & Cole and I'm from the
17 Reading Broadcasting Comparative Rule
18 Proceeding.

19 Are you appearing here pursuant to
20 a notice to take deposition and a subpoena
21 which was served by you on behalf of Adams?

22 A Yes.

1 Q You're represented by Mr. Geolot;
2 is that correct?

3 A Yes.

4 Q Also just for record purposes is
5 Mr. Joseph Boothe, an assistant from my
6 office; Thomas Hunton, who represents Reading
7 Broadcasting; Dennis Southard, who is
8 co-counsel with Mr. Hutton; is that correctly
9 stated?

10 MR. HUTTON: Yes.

11 BY MR. COLE:

12 Q To your immediate right is
13 Mr. Geolot.

14 If you have any questions at all
15 during the course of the deposition, if there
16 is any confusion in your mind, you want
17 clarification, please feel free to let us
18 know. I'll be happy to stop and clear up any
19 questions you might have.

20 If during the course of the
21 deposition you need to take a break or want a
22 drink of water or what-have-you, please,

1 again, let us know. We're happy to
2 accommodate you in that regard.

3 Also I should say we have by
4 speaker phone Mr. James Shook, counsel for
5 the Enforcement Bureau. Mr. Shook, can you
6 hear us all right?

7 MR. SHOOK: I can hear you just
8 fine.

9 BY MR. COLE:

10 Q With that having been said,
11 Ms. Friedman, are you an attorney?

12 A Yes, sir.

13 Q Could you please describe your
14 professional background just generally
15 starting with law school?

16 A I graduated law school in 1989.
17 Went to Schnader Harrison Segal & Lewis after
18 I graduated. Came to Sidley & Austin in
19 April of 1990. Began work at the Federal
20 Communications Bar Association in February
21 of '94, worked for both Sidley & Austin and
22 the FCBA for a few years. Left Sidley &

1 Austin in September of 1995 and left the FCBA
2 in July of 1999.

3 Q So during the period of time from
4 approximately February of '94 to September
5 of '95 you were a practicing attorney with
6 Sidley and working in some capacity with the
7 FCBA as well?

8 A Correct.

9 Q What was your position at the FCBA?

10 A I was the executive director.

11 Q Are you practicing now?

12 A No.

13 Q You started work at Schnader
14 Harrison in '89 upon graduation from law
15 school?

16 A Yes.

17 Q From 1989, when you started with
18 Schnader Harrison, through your tenure at
19 Sidley, did you specialize in any particular
20 area of legal practice?

21 A In communications law.

22 Q Could you briefly describe what

1 your communications practice involved?

2 A It mainly involved representing
3 radio and television station group owners for
4 the FCC.

5 Q During the period of time from 1989
6 through September of 1995, and let's for the
7 purpose of this deposition refer to that as
8 your communications practice because that
9 encompasses the Schnader Harrison years and
10 your Sidley & Austin years. During your
11 communications practice did you have occasion
12 to represent Mr. Michael Parker?

13 A Yes.

14 Q Did you also represent
15 organizations in which Mr. Parker was a
16 principal?

17 A Yes.

18 Q Again, for purposes of our
19 deposition, just to streamline things, if I
20 refer to Mr. Parker, I'm also referring to
21 Mr. Parker and organizations in which he was
22 a principal. Is that fair enough?

1 A Yes.

2 Q When did you first encounter
3 Mr. Parker in your professional capacity?

4 A I don't recall. Maybe 1990
5 or 1991.

6 Q Do you recall the circumstances of
7 your first professional connection with
8 Mr. Parker?

9 A No.

10 Q Do you recall how you came to
11 represent him?

12 A No.

13 Q Was he a client of the law firm
14 that you were with at the time?

15 A Yes, he was a client of Sidley &
16 Austin. I believe he was a client of
17 Schnader Harrison.

18 Q You don't represent Mr. Parker now,
19 do you?

20 A No.

21 Q Is it safe to assume that any
22 connection you had with Mr. Parker ended

1 in 1995, when you left Sidley?

2 A Yes.

3 Q Could you describe to the best of
4 your recollection the nature of your
5 responsibilities as far as Mr. Parker's
6 representation was concerned?

7 A I prepared and filed applications,
8 followed through on those applications, the
9 grants. That was pretty much the
10 representation.

11 Q As far as you're aware during your
12 communications practice of '89 to '95, were
13 Sidley & Austin or Schnader Harrison, the law
14 firms that you were associated with, the only
15 law firms which provided Mr. Parker
16 communications counsel at that time?

17 A I don't believe so.

18 Q Do you know what other law firms
19 provided him counsel during that time?

20 A I don't recall.

21 Q What makes you say that you don't
22 believe that you Sidley & Austin or Schnader

1 Harrison were the only counsel?

2 A I believe Mr. Parker had other
3 interests in other stations that I was not
4 involved in filing applications for.

5 Q When you say "I," do you mean The
6 law firm as well?

7 A I mean Sidley & Austin, the law
8 firm.

9 Q How did you know about those other
10 matters?

11 A I believe Mr. Parker provided us
12 with a list of his other holdings, interests.

13 Q During the course of your
14 representation of Mr. Parker did you
15 personally communicate with Mr. Parker?

16 A Yes.

17 Q Can you recall approximately how
18 often?

19 A I don't recall specifically.

20 Q Do you recall whether your
21 communications were in person?

22 A I don't believe I ever met him.

1 Q By telephone?

2 A By telephone, yes.

3 Q By correspondence?

4 A By correspondence.

5 Q During your communications practice
6 did other attorneys supervise your work with
7 respect to Mr. Parker's matters?

8 A Yes.

9 Q Who were they?

10 A Clark Wadlow.

11 Q Any others?

12 A I don't recall. I believe it was
13 only Clark.

14 Q Would William Andrle have
15 supervised you?

16 A He was an associate at Schnader
17 Harrison. I don't recall that far back.

18 Q How about Mr. Beizer?

19 A Yes, he was a partner at both
20 Schnader and Sidley.

21 Q He supervised you with respect to
22 Mr. Parker's matters?

1 A I don't believe so. Clark Wadlow
2 was the billing partner on the matters.

3 Q How about Mr. Blakely, Craig
4 Blakely?

5 A He was also a partner here at
6 Sidley, but Clark was the billing partner.

7 Q Do you recall whether Mr. Blakely
8 supervised you in any capacity with respect
9 to Mr. Parker's work?

10 A I don't believe he did.

11 Q How about Evan Carb?

12 A Evan was an associate both at
13 Schnader and Sidley.

14 Q Did Mr. Carb ever supervise your
15 work with respect to Mr. Parker's matters?

16 A I believe I worked with Evan on
17 several matters. I don't recall
18 specifically.

19 Q In terms of seniority, was he at
20 the same level of you?

21 A He was senior to me.

22 Q He was senior to you?

1 A (Nodding)

2 Q Do you recall when you first began
3 representing Mr. Parker, the approximate
4 date?

5 A No.

6 Q Was Mr. Parker at Schnader Harrison
7 as a client when you arrived at Schnader
8 Harrison in '89?

9 A I don't remember.

10 Q Did you represent Mr. Parker in
11 connection with an application for transfer
12 of control of the television station in
13 Norwell, Massachusetts, in July of 1991?

14 A I don't believe so.

15 MR. COLE: Can we go off the record
16 just a minute?

17 (Friedman Deposition Exhibit
18 No. 1 was marked for
19 identification.)

20 BY MR. COLE:

21 Q We've just agreed on a procedure
22 for marking the exhibits, which, ideally,

1 will streamline things, and now we're moving
2 forward.

3 I have provided to the witness, to
4 Mr. Geolot and Mr. Hutton a copy of the
5 document which we've marked as Friedman
6 Exhibit Number 1, which is a copy of the
7 July 1991 Form 315 application for transfer
8 of control of station WHRC-TV in Norwell,
9 Massachusetts. Ms. Friedman, you have that
10 now, right?

11 A Yes.

12 Q Do you recall representing
13 Mr. Parker in connection with that
14 application?

15 A No.

16 Q Were you involved in any way in the
17 preparation of that application?

18 A No.

19 Q To your knowledge did anybody at
20 Sidley draft any portion of that application?

21 A I don't believe so.

22 Q Do you know if Mr. Parker conferred

1 with anybody at Sidley concerning the
2 preparation of any portion of this
3 application before it was filed with the FCC?

4 A I wouldn't know.

5 Q Do you know who did prepare that
6 application?

7 A No.

8 Q Did you represent Mr. Parker in
9 connection with a transfer of control
10 application for a television station in
11 Reading, Pennsylvania?

12 A Yes.

13 Q Did you represent Mr. Parker in
14 connection with an application which preposed
15 his acquisition of international broadcast
16 station in Dallas, Texas?

17 A I don't think so.

18 MR. COLE: Let me show you this,
19 Number 2. We'll mark as Friedman Exhibit
20 Number 2 a copy of the document that begins
21 with a cover page dated August 3rd, 1992.

22 It's a letter from Mr. Mike Parker

1 to the FCC transmitting an application FCC
2 Form 314 for assignment of the license of
3 international broadcast station KCBI, Dallas,
4 Texas, to Two If By Sea Broadcast
5 Corporation.

6 (Friedman Deposition Exhibit
7 No. 2 was marked for
8 identification.)

9 BY MR. COLE:

10 Q Have you had a chance to review
11 that?

12 A Yes.

13 Q Were you involved in any way in the
14 preparation of that application which is
15 Friedman Number 2?

16 A No.

17 Q Did you draft any portion of the
18 application at all?

19 A No.

20 Q Did you or anyone else at Sidley,
21 to your knowledge, review any portion of the
22 application before it was filed with the FCC?

1 A To my knowledge, no.

2 Q Did Mr. Parker confer with you
3 concerning the preparation of any portion of
4 that application before it was filed with the
5 FCC?

6 A No.

7 Q Did Mr. Parker tell you that he was
8 going to file that application?

9 A I don't have any recollection.

10 Q Do you know who was involved in the
11 preparation of that application?

12 A No.

13 Q In August of 1992 did Sidley
14 represent Mr. Parker in other matters?

15 A Yes.

16 Q Do you know why Mr. Parker did not
17 use Sidley in connection with the filing of
18 that application?

19 A No.

20 MR. COLE: Let me show you what
21 I'll mark as Friedman Number 3, a letter
22 dated November 14, 1991 addressed to

1 Mr. Parker from Mr. Wadlow. It's two pages
2 in length and it bears the S&A Bates stamp
3 numbers 401, 402 and 403. The letter is
4 dated November 14, 1991. Please take a
5 moment to look through that.

6 (Friedman Deposition Exhibit
7 No. 3 was marked for
8 identification.)

9 BY MR. COLE:

10 Q Have you had a chance to look at
11 that?

12 A Yes.

13 Q Have you ever seen this letter
14 before?

15 A I don't think so, no.

16 Q Now, you mentioned earlier on that
17 Mr. Wadlow was the billing partner for Parker
18 matters; is that correct?

19 A Yes.

20 Q Mr. Wadlow's letter here refers to
21 three clients. Do you see that listed there?
22 Client Partel, second one is Desert 31 and

1 the third one is Reading?

2 A Yes.

3 Q Does that correspond to your
4 recollection of what the Parker accounts were
5 in Sidley?

6 A I believe so, yes.

7 Q Do you recall if there were any
8 other accounts to which work for Mr. Parker
9 was charged by Sidley attorneys?

10 A I don't recall.

11 Q If you could go to the third page
12 of this document, which is a two-column
13 listing entitled, "Breakdown of Partel
14 Billing." Do you see that?

15 A Yes.

16 Q Can you explain why a breakdown of
17 Partel billing was necessary?

18 A No.

19 MR. GEOLOT: Objection.

20 BY MR. COLE:

21 Q Are you familiar with any of the
22 matters listed in the left-hand column of

1 this breakdown of Partel billings?

2 A The name Coastline is familiar, but
3 I don't recall the specifics. Otherwise, no.

4 Q Do you recall whether Coastline
5 involved in any way a Reading Broadcasting,
6 Inc. television station in Reading,
7 Pennsylvania?

8 A I don't remember.

9 Q Do you know whether the line item
10 for Dallas Shortwave involved work for a
11 project other than matters relating to KCBI,
12 the international broadcast station?

13 A I don't know.

14 Q Now, I want to talk about Reading
15 Broadcasting, Channel 51. Do you recall when
16 you first began providing services to
17 Mr. Parker in connection with Station WTVE in
18 Reading?

19 A No.

20 MR. COLE: I show you this which
21 we'll mark as Number 4 and put the sticker
22 down at the bottom, well, I'll put it right

1 here because it's doesn't interfere with any
2 text. I give a copy to Mr. Geolot and a copy
3 to Mr. Hutton.

4 (Friedman Deposition Exhibit
5 No. 4 was marked for
6 identification.)

7 BY MR. COLE:

8 Q What I've provided to you is a copy
9 of a document, which is an FCC Application
10 Form 316, and if we could just refer to it as
11 a short form application. If we're all on
12 board with that, that would be great. This
13 is a short form which is filed with the FCC
14 August 14, 1991. Could you take a look at
15 this and I'll ask you some questions about
16 it?

17 A Okay.

18 Q Are you finished looking at it?

19 A Yes.

20 Q Have you seen this document before?

21 A Yes.

22 Q Can you tell me what it is?